

M11-961

JAP:DAL

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

NAKAIA LITTMAN,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

GREGORY BROOKS, being duly sworn, deposes and states that he is a Special Agent with United States Immigration and Customs Enforcement, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about September 25, 2011, within the Eastern District of New York and elsewhere, defendant NAKAIA LITTMAN did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant

1. On September 25, 2011, the defendant NAKAIA LITTMAN arrived at John F. Kennedy International Airport in Queens, New York, aboard JetBlue flight number 868 from Kingston, Jamaica.

2. Upon arrival, the defendant NAKAIA LITTMAN was interviewed by Customs and Border Protection ("CBP") officers. Following the interview, CBP examined defendant's bags. During that examination, the defendant appeared nervous. LITTMAN was then escorted to a private screening area for a search of her person.


3. During the personal search, CBP officers felt an unusually hard object in the defendant's groin area. Further investigation revealed a cylinder-shaped object had been inserted into the defendant's vagina. A probe of the cylinder revealed a white powdery substance that field-tested positive for the presence of cocaine.

4. The approximate gross weight of the cocaine recovered from the defendant is 271.1 grams.

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facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that the defendant NAKAIA LITTMAN be dealt with according to law.

  
GREGORY BROOKS  
Special Agent  
Homeland Security Investigations

Sworn to before me this  
26th day of September, 2011

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